

A teal-colored 3D graphic consisting of a vertical bar and a horizontal bar meeting at a right angle, positioned on the left side of the slide.

# **Special Topic**

## **EGS 00-01: Discovery and Control of Legacy Radiological Material**

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# **Legacy Contamination**

## **Background**

**Radioactive contamination resulting from historical activities that is unrelated to current operations.**

**Overview of contractor “practices” that led EH-10 to consider development of EGS.**

**Pre-EGS discussions of legacy contamination issues at EFCOG PAAA working group’s semiannual meetings.**

# **Legacy Contamination**

## **Regulations**

**Part 835 does not discuss pre-existing or legacy contamination situations.**

**Part 835 does not exclude pre-existing or legacy contamination conditions.**

**Sections of Part 835 that can apply to legacy contamination:**

**835.401(a)(2) - document radiological conditions**

**835.603(e) - “Contamination Area” posting**

**835.1102(b) and (c) - control of contamination areas**

**Part 830.120 can also apply with respect to Work Processes and Quality Improvement.**

**Part 835 does not directly address soil contamination.**

# **Legacy Contamination**

## **Enforcement**

**EH-10 issued EGS in May 2000.**

**Legacy contamination due to historical operations but EGS avoids defining “historical.”**

**To invoke enforcement discretion, contractor needs to be proactive in assessing potential for legacy contamination and providing appropriate remediation and worker protection.**

**Legacy contamination-related noncompliances should be reported to the NTS if the noncompliance meets the reporting thresholds. Otherwise, describe in nonreportable event database along with any corrective actions.**